

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JONATHAN RIVERA-PIEROLA,

Plaintiff,

V.

**BOARD OF REGENTS FOR THE
OKLAHOMA AGRICULTURAL
AND MECHANICAL COLLEGES,
STATE OF OKLAHOMA ex rel
OKLAHOMA STATE
UNIVERSITY, and ST MATTHEWS
UNIVERSITY INC,**

Defendants.



NO. CIV-21-616-PRW

DECLARATION OF JOHN D. MARVIN

1. I, John D. Marvin, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

2. I am an adult and am otherwise competent to testify to the facts stated below. The facts stated in this Declaration are within my personal knowledge and are true and correct.

3. I currently serve as a Senior Advisor at St. Matthew’s University, Inc. (“SMU”).
From June 2006 to December 2020, I served as Chancellor of SMU.

4. Jonathan Rivera-Pierola (“Plaintiff”) enrolled as a student at SMU on January 9, 2017 and continued as a student until he was dismissed on April 23, 2020.

5. During the new student orientation at SMU's Cayman Island campus, new students, including Plaintiff, are informed that SMU maintains a Student Handbook, which is available on the Moodle Learning Management System.

6. During the new student orientation at SMU's Cayman Island campus, students are also presented with Appendix D of the Student Handbook, Waiver of Right to Reassignment for Clinical Rotations School of Veterinary Medicine ("Waiver").

7. Plaintiff attended new student orientation at SMU's Cayman Island campus on January 9, 2017. Plaintiff signed and returned the Waiver during the new student orientation.

Executed on this 9th day of November, 2021.

A handwritten signature in black ink, appearing to read "John D. Marvin". The signature is fluid and cursive, with a long horizontal stroke at the end.

John D. Marvin